



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 25 2000

OFFICE OF
WATER

Brian E. Foss
Port Director
Santa Cruz Harbor
135 5th Avenue
Santa Cruz, CA 95062

Dear Mr. Foss:

Thank you for your March 27 letter following up on your recent visit to Washington, D.C. with the California Marine Affairs and Navigation Conference. Specifically, you have raised concerns over limitations on the beneficial use of dredged material for beach nourishment projects where the grain size of the material is not almost entirely sand. We have discussed this issue with our Regional Office in San Francisco and at a meeting of the Interagency National Dredging Team and can confirm that grain size ratios of large to fine material are "rules of thumb" only, that the regulation of beach nourishment activities under the Clean Water Act allows for site specific determinations of appropriate grain size ratios, and that the agencies are supportive of the type of research your Harbor is undertaking.

EPA encourages your harbor to seek beneficial disposal alternatives such as beach nourishment. While EPA encourages beneficial use projects, such projects must be environmentally protective by complying with the Clean Water Act Section 404(b)(1) Guidelines. The Guidelines and the guidance provided in the Inland Testing Manual emphasize physical compatibility for proposed discharges, but provide case-specific flexibility to grain size considerations for beach nourishment projects. In order to make case specific determinations, appropriate supporting information is needed to evaluate a given beach nourishment project, and it appears that such site-specific information is what is being generated for Santa Cruz Harbor. While the "80%/20%" rule of thumb is applied in situations where more detailed information is lacking, it is not the only appropriate ratio.

EPA is pleased that the Harbor's evaluation efforts will provide information that could be used as a basis for documenting that a higher percentage of fine grain materials may be discharged for beach nourishment in a manner consistent with the Guidelines.

In that regard, we look forward to our May 12th briefing of the National Dredging Team by Patrick McLaren, author of the Santa Cruz Sediment Trends Analysis study, to discuss the findings of his report.

We will continue to work further with you in this effort and look forward to next month's meeting. Should you have further questions, please contact Brian Ross of Region IX, (415) 744-1979.

Sincerely,

A handwritten signature in black ink, appearing to read "John Goodin". The signature is fluid and cursive, with the first name "John" and last name "Goodin" clearly distinguishable.

John Goodin

Chief, Wetlands and Aquatic Resources Regulatory
Branch